

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

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No. 23-766 T

(Judge Matthew H. Solomson)

PAUL BRUYEA,

Plaintiff,

v.

UNITED STATES,

Defendant.

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**UNOPPOSED MOTION LEAVE TO FILE MOTION FOR EXTENSION OUT OF TIME**

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Defendant, the United States, files this motion for leave to file a motion for extension of time to respond to the Complaint out of time. As good cause therefor, defendant states:

Defendant's response to the Complaint in this case was due on September 22, 2023. On Thursday, September 21, 2023, defendant's counsel drafted an unopposed motion seeking a two-week extension of that deadline. Defendant's counsel prepared a PDF version of that motion for filing, but defendant's counsel inadvertently failed to file the motion on the Court's ECF system. Defendant's counsel learned of the oversight today and sincerely apologizes for the error.

Defendant respectfully seeks leave of Court to file the motion out of time. A copy of the unopposed motion for extension of time is attached.

Plaintiff's counsel has advised defendant's counsel that plaintiff is unopposed to the relief sought.

September 25, 2023

Respectfully submitted,

/s/ Jason Bergmann

JASON BERGMANN

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